

REMARKSI. Introduction

In response to the Office Action dated April 10, 2002, claims 1, 12, and 34 have been amended. Claims 1-34 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II. Claim Amendments

Applicants' attorney has made amendments to the claims as indicated above. These amendments were made solely for the purpose of clarifying the language of the claims, and were not required to distinguish the claims over the prior art.

III. Examiner Interview

On July 8, 2002, an interview was conducted between Jason S. Feldmar, Reg. No. 39,187 and Examiner Bashore. Applicants appreciate the Examiner's time in conducting the interview. The current claims (primarily claim 1) and the use of a FORM tag element vs. an element transferred from a form (as claimed) were discussed in view of Francis. The Examiner indicated that the preamble suggested that the form is in an HTML page and therefore was confusing if in fact it is not an HTML FORM tag element. Accordingly, Applicants agreed to clarify this language in the preamble. The Examiner indicated that such an amendment would be considered.

IV. Drawings

In paragraph 11 of the Office Action, the Examiner notes that the application was filed with informal drawings and that formal drawings would be required when the application is allowed. Applicants appreciate this acknowledgement and will file formal drawings when the application is allowed.

V. 37 CFR 1.75(c) Non-Art Rejection

In paragraph 12 of the Office Action, claims 2, 13, and 24 were objected to for failing to further limit the subject matter of a previous claim. Additionally, paragraph 18 of the Office Action disagreed with Applicants' prior traversal of this rejection as follows:

Applicants traverse the Examiner's objection of claims 2, 13, 24 under CFR 1.75(c), as being of improper dependent form for failing to further limit the subject matter of a previous claim. Applicants argue on page 8 (section VIII - Non Art Rejection) of the amendment that dependent claims 2, 13, 24 provide a timing element, therefore providing a further limitation of the independent claims. The Examiner respectfully disagrees. The Examiner notes that Applicants appear to contradict their own position set forth in Petition under 37 CFR 1.181 to invoke Supervisory Authority (filed 5/21/2001 as paper #5). Page 2 of said petition states in part:

"The Applicants' amendment of the claims merely amended the independent claims to incorporate dependent claim limitations. For example, the independent claims 1, 12, 23 were amended to include a limitation such that the element was transferred from a form to an HTML page and an HTML file associated with the HTML page, which limitation was incorporation from dependent claims 2, 13, and 24 respectively of the application as originally filed".

Using claims 1, and 2 as an example, the relevant limitation of claim 1 states:

"reading information from a project file, the information comprising a relationship between an element that has been transferred from a form to an HTML page and the HTML file associated with the HTML page".

Dependent claim 2 states:

"The method of claim 1, wherein the information is generated when the element is transferred from the form to the HTML page associated with the HTML file."

The Examiner does not see any evidence of claim 2 further limiting the subject matter of independent claim 1. This equally applies to claim 13 (dependent from claim 12), and claim 24 (dependent from claim 23).

Applicants continue in their traversal of this rejection. The petition to remove the finality did in fact provide that limitations from claims 2, 13, and 24 were incorporated into the independent claims. However, not all of the limitations in claims 2, 13, and 24 were incorporated. The limitations that were incorporated provided that the element was "transferred from a form to an HTML page and an HTML file associated with the HTML page". However, the timing element regarding when the information was generated was not incorporated into the independent claims. The Petition to remove the finality was based on the rationale that some of the dependencies were brought up (and not all of them). Accordingly, the Applicants positions are not contradictory. In this regard, Applicants continue to submit that the dependent claims provide a limitation regarding when the information is generated. The independent claims do not provide for such a limitation. Accordingly, claims 2, 13, and 24 do in fact further limit the subject matter of the independent claims.

Should the Examiner continue to feel that such a limitation does not further limit the independent claims, Applicants request that the Examiner specifically refer to the language in the independent claims that provide the timing element as to when the information is generated.

VI. 35 USC §112 Non-Art Rejection

Claims 1, 2, 12, 13, and 34 are rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Specifically, claims 1, 2, 12, 13, and 34 were rejected based on unclear antecedent basis.

Applicants have amended claims 1 and 12 to clarify that the same form is being used throughout the claim. Accordingly, Applicants submit that this rejection is now moot.

Additionally, claim 34 was rejected for indefiniteness, Applicants have amended claim 34 and submit that this rejection is now moot.

VII. Office Action Prior Art Rejections

In paragraphs (14)-(15) of the Office Action, claims 1-8, 11-19, 22-30, and 33-34 were rejected under 35 U.S.C. §103(a) as being unpatentable over Foley et al., U.S. Patent No. 5,706,502 (Foley), in view of Arora et al., U.S. Patent No. 5,911,145 (Arora), and further in view of Francis et al., U.S. Patent 6,182,092 (Francis). In paragraph (16) of the Office Action, claims 9-10, 20-21, and 31-32 were rejected under 35 U.S.C. §103(a) as being unpatentable over Foley, Arora, and Francis as applied to claims 1, 12, and 23 above, and further in view of Lisle et al., U.S. Patent No. 6,069,630 (Lisle).

The Office Action rejects claim 1 in an almost identical manner to that of prior rejections as follows:

In regard to independent claim 1, Foley teaches:

- project files within a portfolio file, said portfolio file containing references to members of a set of project files, said project file containing a URL of an HTML file including an applet tag (Foley column 2 lines 55-63, column 8 lines 57-59, Figure 3 item 170A; compare with claim 1 "*reading information from a project file...*").

- Foley does not specifically teach a relationship between a form element and an HTML page and its associated HTML file. However, Francis teaches embedded form objects in an HTML page (said page processing a file name), whereby a relationship between form objects within said HTML page is generated with the help of a "Structured Language Element-to-Embeddable Object Class Association Table" (Francis column 4 lines 45-52, column 10, lines 53-64, column 14 lines 55-61; compare with claim 1 "*...the information comprising a relationship between an element that has been transferred from a form to an HTML page and the HTML file associated with the HTML page*", and "*from the form*"). It would have been obvious to one of ordinary skill in the art at the time of the invention to apply Francis to Foley, because of Francis's taught advantage of defining relationships in order to provide editing of pages and forms within a single environment (as taught by Francis), to the single portfolio environment of Foley (See Francis column 4 lines 25-30).

- processing an applet referenced in each web document (Foley column 5, lines 32-49); compare with claim 1 "*processing the information to map the element to the HTML file*".

- a graphical user interface in the form of a Java Workshop, including presented icon specifications and a toolbar (Foley Figure 1, column 4, lines 28-43). Francis teaches a relationship between form objects within said HTML page as previously discussed, above. Foley does not specifically teach the visual display between mapped elements and an HTML file. However, Arora teaches the displayed mapping of elements to an HTML page (Arora Abstract, column 10 lines 60-65, column 14 lines 32-36, Figures 22, 42). Compare the above with claim 1 "*displaying the mapping on a graphical user interface that includes the relationship between the element, the form, and the HTML file*". It would have been obvious to one of ordinary skill in the art at the time of the invention to apply Arora to Foley and Francis, because of the advantage of visibly showing mapped files, links, and objects of an HTML page in an organized fashion that Arora brings to Foley.

In response to Applicants' prior response that clearly set forth distinguishing factors, the Office Action responded as follows:

Applicant's arguments filed 1/23/2002 (paper #8) have been fully and carefully considered but they are not persuasive.

Applicant argues on page 8 (at top) of the amendment that the cited art of references do not teach an element that has been transferred from a form to an HTML page, providing a mapping from an element transferred from a form to an HTML file associated with an HTML page, and displaying a mapping from an element to an HTML file in a graphical user interface that indicates the relationship between the element, the form, and the HTML file. Applicant also argues on page 8 (at bottom) to page 9 (at top) of the amendment that Francis's Table is merely a list of tag components and an identifier for an object used to create a component. The examiner notes that Francis teaches embedded form objects in an HTML page (said page possessing a file name), whereby a relationship between form objects within said HTML page is generated with the help of said Table. Francis teaches a class identifier identifying an object selected according to a selected tag component (e.g., an HTML tag name) of the structured language element with reference to said Table (Francis column 4 lines 45-50). Francis teaches HTML tag names as form tag names (Francis column 10 lines 50-60, column 15 lines 40-50), and teaches "*a relationship between an element that has been transferred from a form to an HTML page and the HTML file associated with the HTML page*".

Applicant argues on page 9 of the amendment that the cited art of references do not teach mapping an element to an HTML file. The examiner notes that Foley teaches project files. Francis teaches mapping between HTML form tag elements and an HTML file.

Applicant argues on page 10 of the amendment that Arora does not teach mapping an element to an HTML file. The examiner notes that Arora teaches the displayed mapping of elements to an HTML page (Arora column 14 lines 32-36, Figures 22, 42). In additional support of this rejection, Arora teaches a structure editor for Websites, including defining the layout of each page in a site (Arora Abstract). Arora also teaches a page editor including values of Properties window (properties for a displayed page) (Arora column 10 lines 61-67), and a list of draw objects (Arora column 11 lines 7-20).

In view of the rejection and the Interview with the Examiner, Applicants respectfully continue to traverse these rejections for one or more of the following reasons:

- (1) *Neither Foley, Francis, nor Arora teach, disclose, or suggest the form as claimed;*
- (2) *Neither Foley, Francis, nor Arora teach, disclose, or suggest an element that has been transferred from a form to an HTML page;*

(2) *Neither Foley, Francis, nor Arora teach, disclose, or suggest providing a mapping from an element transferred from a form to an HTML file associated with an HTML page;*

(3) *Neither Foley, Francis, nor Arora teach, disclose, or suggest displaying a mapping from an element to an HTML file in a graphical user interface that indicates the relationship between the element, the form, and the HTML file;*

(4) *Francis' form object is distinguishable from and not even remotely similar to the form from which elements are transferred from as claimed;*

The present claims provide for displaying (in a graphical user interface) a relationship (i.e., mapping) between an HTML file and an element from a form, wherein the element was transferred to an HTML page. The graphical user interface indicates the relationship between the element, the form that the element was transferred from, and an HTML file that the element was transferred to. Such claim language illustrates that the user may easily view the relationships of objects involved in the creation of a web page in a graphical user interface. Such viewing capability may further allow a user to easily manipulate a page and various elements in a page using a tool for building an HTML page (associated with an HTML file). Further, as described in the specification, since the form contains one or more elements, and many instances of an element may be used in various HTML pages, only one copy of the form (that includes the element) needs to be retrieved locally (see page 15, lines 1-5). Accordingly, processing and transfer time are optimized.

Once the information is read from the project file that contains the relationship between the element and a particular HTML file, the information is processed to obtain a mapping from the element in the form to the HTML file. Once obtained, the mapping is displayed in a graphical user interface. The graphical user interface allows the user to identify the element in the HTML file, the form where the element was transferred from, and the HTML file where the element was transferred to.

The Office Action admits that Foley fails to teach the relationship between a form element and an HTML page and its associated HTML file and utilizes Francis to teach this claim element. The Office Action cites col. 10, lines 53-64 to teach the form as claimed. Col. 10, lines 53-64 merely refers to an HTML FORM tag element. Essentially, Francis's HTML FORM tag element is utilized to teach the element transferred from a form as claimed. However, as described herein and as discussed in the Interview with the Examiner, an HTML FORM tag element is clearly

distinguishable from an element that has been transferred from a form to an HTML page. While the element transferred could be a FORM tag element, a FORM tag element is not equivalent to a form from which elements are transferred into an HTML page.

Further, the Office Action uses Francis' "Structured Language Element-to-Embeddable Object Lass Association Table" (hereinafter referred to as "Table") to provide for the relationship. Col. 16, lines 43 - col. 17, line 8 describes such a Table. As described in Francis, the Table merely comprises an HTML tag component 226 with an object class identifier (CLSID) 234 (see col. 16, lines 48-50). Accordingly, the Table is merely a list of tag components and an identifier for an object used to create the component. As further illustrated in Francis, when an HTML tag is identified/selected while trying to transform an HTML document into RTF format (see col. 15), the Table is searched for the selected tag component (see col. 16, lines 64-66). Thus, the Table in Francis is a relationship between a tag and an object used to create the tag and not an element and a form and an HTML file. Further, there is no indication in Francis that the class in the Table is from a form.

Such a Table is clearly distinguishable from information or a mapping that indicates the transfer from a form (and not an object or a class) to an HTML file associated with the HTML page (as claimed). Further, contrary to that suggested in the Office Action, a listing of objects and tags is NOT equivalent to a relationship between an element that has been transferred from a form to an HTML page and the HTML file associated with the HTML page. Thus, while Francis describes tags and class ids, there is no fully displayed mapping that indicates the form where an object/element is obtained from or the HTML file that the object/element is placed in.

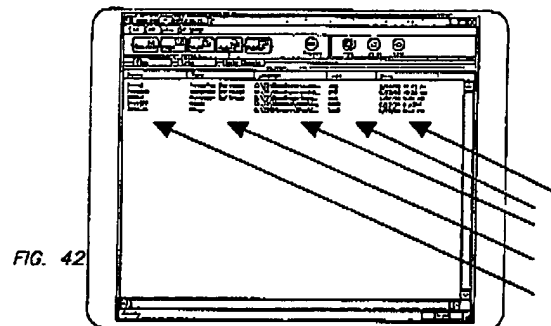
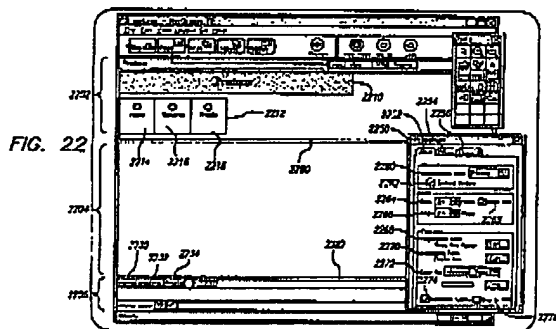
Additionally, the Table of Francis is used to convert HTML to RTF (see col. 14, line 56 – col. 15 line 2). However, in the present invention, the end result is the display in a graphical user interface of a mapping that indicates the relationships. Such a display may then be manipulated and used as the user desires. Such a method, use, and result are clearly distinguishable from that of Francis.

The Office Action submits that Foley provides for the second element of the independent claims. However, while Foley may provide for processing an applet referenced in each web document (as indicated in the Office Action), such processing does not result in mapping the element to the HTML file. In Foley, the processing merely provides that the JWS browser pulls in

and begins executing any referenced applets found in a Web document (see col. 5, lines 9-31). However, the present claims provide that the processing results in mapping an element that has been transferred from a form to an HTML page and not beginning the execution of the applets. Execution of an applet is clearly different from mapping. Accordingly, Foley fails to teach, disclose, or suggest the invention as claimed.

Additionally, even if Foley were combined with Francis, the result would be to process the applets in a web document (from Foley) and add them to a table of applets and their corresponding tags (as in Francis). Such a teaching is clearly different from reading information and processing to obtain a mapping from the element to an HTML file.

The Office Action rejects the last claim element under Arora FIGS. 22 and 42 and col. 14, lines 32-36 and indicates that Foley fails to teach this element. However, as indicated in the prior Office Action response, FIGS. 22 and 42 and col. 14, lines 32-36 of Arora provide for an Assets Display that shows the files, links, and objects in a data processing system.



The assets shown in FIG. 42 are the draw objects for the products page of FIG. 22. Viewing FIG. 42, it appears that the Assets Display has a name of an object/file, the type of the object, a location of the object, a size of the object, and a date (see annotation). Thus, FIG. 42 merely provides a listing of the objects within a particular project. There is no mapping indicating an HTML file where the object is located. Furthermore, there is no indication or concept anywhere in FIG. 42 that the element has been transferred from a form to an HTML page. Listing objects found in a folder is not equivalent to displaying a mapping of elements from a form to an HTML

file. Further, there is no suggestion to add a mapping from any other reference to the listing. The listing is merely a listing of very generalized information about objects in a particular project and the folder location where the object is stored. To contend that displaying a list of elements is equivalent to displaying particular specially obtained mapping information is without merit. Accordingly, Arora fails to teach, disclose, or suggest the invention as claimed.

None of the cited references provides for all of the capabilities and details as claimed. Further, as described above, when combined, the references actually teach away from Applicants' invention. Additionally, the various elements of Applicants' claimed invention together provide operational advantages over the systems disclosed in Foley, Arora, Francis, and Lisle. In addition, Applicants' invention solves problems not recognized by Foley, Arora, Francis, and Lisle.

Thus, Applicants submit that independent claims 1, 12, 23, and 34 are allowable over Foley, Francis, and Arora. Further, dependent claims 2-11, 13-22, and 24-33 are submitted to be allowable over Foley, Arora, Francis, and Lisle in the same manner, because they are dependent on independent claims 1, 12, 23, and 34, respectively, and because they contain all the limitations of the independent claims. In addition, dependent claims 2-11, 13-22, and 24-33 recite additional novel elements not shown by Foley, Arora, Francis, and Lisle.

VIII. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

GATES & COOPER LLP
Attorneys for Applicant(s)

Howard Hughes Center
6701 Center Drive West, Suite 1050
Los Angeles, California 90045
(310) 641-8797

Date: July 10, 2002

By: Victor G. Cooper
Name: Victor G. Cooper
Reg. No.: 39,641

VGC/JSF/amb

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APPENDIX: VERSION WITH MARKINGS TO SHOW CHANGES MADE

1. (FOUR TIMES AMENDED) A method of displaying a relationship between an HTML file and an element from a form, wherein the element [that] is in an HTML page, comprising:

reading information from a project file, the information comprising a relationship between [an] the element that has been transferred from [a] the form to [an] the HTML page and the HTML file associated with the HTML page;

processing the information to map the element from the form to the HTML file; and

displaying the mapping on a graphical user interface that indicates the relationship between the element, the form, and the HTML file.

12. (FOUR TIMES AMENDED) A apparatus for displaying a relationship between an HTML file and an element from a form, wherein the element [that] is in an HTML page, comprising:

means for reading information from a project file, the information comprising a relationship between [an] the element that has been transferred from [a] the form to [an] the HTML page and the HTML file associated with the HTML page;

means for processing the information to map the element from the form to the HTML file;
and

a display for presenting the mapping to a user on a graphical user interface that indicates the relationship between the element, the form, and the HTML file.

34. (THREE TIMES AMENDED) A computer readable data structure for representing a software project in a single file, the software project comprising a project application defined by executable programming logic, and a project environment for developing the application, the data structure comprising:

a first section comprising the executable programming logic needed to load and execute the project application in the computer; and

a second section for storing data required to restore the project environment, and for storing information comprising a relationship between elements that have been transferred from a form to an HTML page and HTML files associated with the HTML page in the project;

wherein the relationship between elements, the form, and the HTML file is [capable of being] displayed in a graphical user interface.